

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing a Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

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**COMMENTS OF NORTH COUNTY COMMUNICATIONS CORP. IN RESPONSE TO  
CENTURYLINK, INC. SUPPLEMENTAL PETITION FOR LIMITED WAIVER**

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**INTRODUCTION**

Pursuant to Public Notice DA 12-1564, North County Communications Corp. (“NCC”) submits its comments regarding CenturyLink, Inc.’s (“CenturyLink” f/k/a Qwest) supplemental petition for limited waiver of the Commission’s call signaling rules (“Supplemental Petition”). CenturyLink has not demonstrated good cause for the requested waiver, and the Commission should deny the Petition.

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## DISCUSSION

The Supplemental Petition extends CenturyLink's original request that it be exempt from transmitting charge number ("CN") or calling party number ("CPN") via MF signaling.<sup>1</sup> The Supplemental Petition and Initial Petition suffer from the same flaws: both fall well short of demonstrating technical infeasibility or financial hardship. Instead, CenturyLink contends in summary fashion that the transmission of CN and CPN is technically infeasible where MF is utilized. As noted by NCC in its comments on the Initial Petition, CenturyLink provides: (i) no affidavits from its in-house switch experts to describe why compliance is technically infeasible; (ii) no documentation about its switches or what capabilities exist for complying with the new rules; and (iii) no declarations from its switch manufacturers to support claims of technical infeasibility. *See* NCC Feb. 29, 2012 Comments at 2.

In a 2011 interconnection agreement arbitration, in which NCC sought delivery of CN/CPN over its MF interconnection trunks, CenturyLink (then Qwest) claimed technical infeasibility but admitted that it never "discuss[ed] its switches' capabilities with its switch manufacturers' representatives." *Id.* at 2, Ex. A. NCC knows that ANI can be transmitted over MF interconnection trunks because it has done so with another LEC that uses Northern Telecom DMS switches. In addition, Lucent representatives have confirmed that ANI could be delivered over MF interconnection trunks with a simple trunk reconfiguration and no switch modifications. *Id.* at 2, Ex. B. The Commission should not permit CenturyLink's continued efforts to feign ignorance where MF signaling and ANI are concerned.<sup>2</sup>

Although the Commission recognizes the validity of MF signaling and the importance of providing ANI, CenturyLink refuses to send or receive ANI over MF interconnection trunks,

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<sup>1</sup> *See* CenturyLink Initial Petition, filed Jan. 23, 2012. Public Notice, 27 FCC Rcd 466 (2012).

<sup>2</sup> NCC has offered its switch experts to Qwest to configure the switches to send ANI over MF signaling.

despite the fact that CenturyLink provides ANI via MF signaling on long distance (*e.g.*, FGD) trunks to IXC's and 911 trunks. Accordingly, it is inaccurate for CenturyLink to claim that it cannot transmit ANI, CN or CPN via MF signaling. Moreover, CenturyLink claims it cannot retransmit ANI, CN or CPN from MF carriers to carriers using SS7 signaling; however, that inability is CenturyLink's responsibility because it refuses to accept ANI from MF carriers.

In an attempt to assuage the Commission's concerns about granting the requested waivers, CenturyLink claims that "carriers have developed a methodology for addressing [CN and CPN transmission] limitation[s] and for ensuring accurate jurisdictionalization and billing." *See, e.g.*, Supplemental Petition at 8 and 9. However, CenturyLink does not disclose the fact that the so-called methodologies imposed by CenturyLink are hotly disputed. For example, NCC has complaints pending against CenturyLink before the Public Utility Commission of Oregon and the Arizona Corporation Commission. *See NCC v. CenturyLink*, Ore. PUC, Docket No. IC 16 (filed Aug. 20, 2012); *see also NCC v. CenturyLink*, Ariz. Corp. Comm'n, Docket Nos. T-03335A-12-0368 and T-01051B-12-0368 (filed Aug. 16, 2012). Among other issues, each complaint alleges that CenturyLink's unilaterally imposed methodology for determining traffic jurisdiction and accurate billing is based on faulty assumptions and inaccurate data.

In addition, CenturyLink puts forth wholly unsupported and vague contentions that compliance with the Commission's rules would entail "significant costs" and "very high costs" "in the millions of dollars." Supplemental Petition at 6, 8. The Commission cannot base its rulemaking processes and waiver determinations on such meaningless contentions.<sup>3</sup>

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<sup>3</sup> CenturyLink gives no basis how changing a simple class of service trunk parameter setting can supposedly cost millions of dollars.

## **CONCLUSION**

CenturyLink has failed to support its requests, and thus, has failed to demonstrate good cause. Accordingly, the Commission should deny the Petition, or at the very least, require CenturyLink to refile with adequate supporting documentation so that interested parties can comment on substantive issues and not on theoretical, unsupported statements.

Respectfully submitted,

/s/R. Dale Dixon, Jr.  
R. Dale Dixon, Jr.  
Law Offices of Dale Dixon  
1155 Camino Del Mar, #497  
Del Mar, California 92014  
(858) 925-6074  
[dale@daledixonlaw.com](mailto:dale@daledixonlaw.com)

Attorneys for North County  
Communications Corporation

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